

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

BRAD AMOS,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 3:21-cv-00923
)	Judge Richardson
THE LAMPO GROUP, LLC,)	Jury Demand
)	
)	
Defendant.)	

PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION IN LIMINE NO. 7

Plaintiff, Brad Amos, through undersigned counsel, moves that the Court deny Defendant's Motion in Limine Number 7 on evidence of Defendant's CEO Dave Ramsey's personal religious beliefs.

Defendant The Lampo Group, LLC does business as and is commonly known as "Ramsey Solutions." Defendant's flagship radio show is "The Dave Ramsey Show." Dave Ramsey is the Founder of Defendant and has been its sole Chief Executive Officer since its creation in the early 1990s. Mr. Ramsey has ultimate control of Defendant. Mr. Ramsey developed the values that are the subject of this matter. For Defendant to suggest that Ramsey Solutions and Mr. Ramsey do not share the same beliefs, as it does in its Motin in Limine Number 7, would require an admission that Mr. Ramsey does not believe in (1) things over which he has control, or (2) the values of Defendant that are core to this case. The only logical conclusion to be drawn is that Defendant's beliefs are Mr. Ramsey's beliefs.

Excluding discussion of Mr. Ramsey's beliefs ignores the influence those beliefs have on Defendant. No other individual has had the opportunity or ability to shape Defendant's values the

Commented [BH1]: Wouldn't it also be an admission he doesn't believe any of the BS he is spewing to his evangelical base that makes him a multimillionaire?

way Mr. Ramsey has. Because of his integral role in shaping Defendant's agenda, values, and policies, Mr. Ramsey's beliefs are inherently relevant under Rule 401.

Defendant's reliance on Rule 610 is inappropriate. Discussion of Mr. Ramsey's beliefs and how they shaped the beliefs of Defendant would be factual proof of how the beliefs that affected Mr. Amos, not to "attack or support the witness's credibility." Further, this case is about the differences between Lampo and Mr. Amos's religious beliefs and how Lampo discriminated against Mr. Amos for his beliefs and/or Mr. Amos not conforming to Lampo's beliefs. Discussion of religious beliefs is central and relevant. Juror confusion is again not an issue except under Defendant's confounding proposition that Mr. Ramsey and Ramsey Solutions do not share the same beliefs.

Further Defendant itself conflates the values of the organization with those of Mr. Ramsey. In the Deposition of Mr. Ramsey, Plaintiff's counsel inquired about how the company would deal with a certain hot-button issue in Christian religious circles. Defendant's counsel objected, stating "Why did you bring Mr. Ramsey here to ask *his views* on [topic]?"¹

For the above reasons, Plaintiff respectfully moves the Court to deny Defendant's seventh motion in limine and allow evidence of Dave Ramsey's personal religious beliefs.

Respectfully Submitted,

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¹ Deposition of Dave Ramsey, page 173(emphasis added). Given the pending motions related to the public availability of Mr. Ramsey's deposition, hopefully this phrasing and shielding of information is acceptable to Defendant.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was served electronically via the Court's CM/ECF system this 30th day of June, 2025 to the following:

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